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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

Alexandra Marie Tauken Gehrke,

Defendant.

CR-24-01040-PHX-ROS

**MOTION FOR ORDER
OF FORFEITURE**

Plaintiff United States of America moves for a preliminary order of forfeiture. A proposed order is submitted with this motion.

On October 24, 2024, defendant Alexandra Marie Tauken Gehrke, pleaded guilty to Count 1 of the indictment charging the defendant with a violation of 18 United States Code (U.S.C.) § 1349, Conspiracy to Commit Health Care Fraud and Wire Fraud, a Class C felony offense.

The following property described in the forfeiture allegation of the Indictment (Doc. 6) and listed in Exhibit 1 of the Plea Agreement (Doc. 118), or identified in the Stipulation of Parties Regarding Forfeiture of Additional Property (Doc. 154), is subject to forfeiture because it is property, real or personal, involved in the offenses of conviction, or property traceable to such property involved in the offenses:

- 1) 1637 North Sunset Drive, Tempe, AZ 85281, titled in the name of J King Holdings LLC, more particularly described as: Lot 109, of Cavalier Hills Unit Two, according to the plat of record in the office of the County Recorder of

- 1 Maricopa County, Arizona, recorded in Book 90 of Maps, Page 44. APN: 132-71-
2 109;
- 3 2) 6246 East Hillcrest Blvd., Scottsdale, Arizona 85251, titled in the name of
4 Gabriel Vadasz, Trustee of the AEAGJK Irrevocable Trust, dated January 9,
5 2024, more particularly described as: Lot 15, Camelback East, according to the
6 plat of record in the Office of the County Recorder of Maricopa County Arizona,
7 recorded in Book 135 of Maps, Page 11. APN: 172-27-016;
- 8 3) The 2016 Ferrari 488 Spider bearing Vehicle Identification Number
9 ZFF80AMA6G0219407, titled to JEXIE ENTERPRISES INC;
- 10 4) The 2023 Mercedes-Benz SL63 AMG bearing Vehicle Identification Number
11 W1KVK8BB6PF015497, titled to JEXIE ENTERPRISES INC;
- 12 5) 2023 Mercedes-Benz GLE bearing Vehicle Identification Number
13 4JGFB6BB7PA858815, titled to KING MEDICAL CONSULTANT LLC;
- 14 6) The 2022 Mercedes-Benz G63 bearing Vehicle Identification Number
15 W1NYC8AJ6NX455281, titled to AMTG Medical Consultant, LLC;
- 16 7) \$19,591,940 seized from the U.S. Bank checking account ending in 5798 in the
17 name of ALEXANDRA GEHRKE;
- 18 8) \$13,576,549.93 seized from the U.S. Bank checking account 7681 in the name of
19 AMTG MEDICAL CONSULTANT LLC;
- 20 9) \$10,793,620 seized from the U.S. Bank checking account ending in 7699 in the
21 name of JEXIE ENTERPRISES INC;
- 22 10) \$8,000,000 Sentinel Security Life Insurance policy number ending in 5602 in the
23 name of ALEXANDRA GEHRKE;
- 24 11) \$8,000,000 Sentinel Security Life Insurance policy number ending in 8279 in the
25 name of JEFFREY KING;
- 26 12) \$8,000,000 North American Company for Life and Health Insurance policy
27 number ending in 0314 in the name of ALEXANDRA GEHRKE;
- 28 13) \$3,320,969.25 seized from the Charles Schwab account ending in 3965 in the
name of JKING VENTURES INC;

- 1 14) \$1,265,539.26 seized from the Charles Schwab account ending in 9244 in the
- 2 name of KING MEDICAL CONSULTANT LLC;
- 3 15) \$1,000,025.19 seized from the Wells Fargo Bank checking account ending in
- 4 1101 in the name of JEXIE ENTERPRISES INC;
- 5 16) \$2,800,000 from the Alerus Bank checking account ending in 8329 in the name of
- 6 JEXIE ENTERPRISES INC;
- 7 17) \$1,999,978 seized from the Alerus Bank checking account ending in 7834 in the
- 8 name of ALEXANDRA GEHRKE;
- 9 18) \$1,390,922.91 seized from the Alerus Bank checking account ending in 8220 in
- 10 the name of AMTG MEDICAL CONSULTANT LLC;
- 11 19) \$940,373 seized from the U.S. Bank checking account ending in 7665 in the name
- 12 of THE FITZGERALD IRREVOCABLE TRUST;
- 13 20) \$512,857.28 seized from the Alerus Bank checking account ending in 2750 in the
- 14 name of CAPITAL IS KING LLC;
- 15 21) Three 1-ounce PAMP Suisse 999.9 Fine Gold Bullion - N493741, N493740 and
- 16 N493742;
- 17 22) Twenty 2024 1-ounce .999 Pure Silver American Eagles in holder;
- 18 23) Two PAMP Suisse 1-ounce Fine Gold Bullion - N93739 and N93738;
- 19 24) Twenty-three Counterfeit Louis Vuitton Bags;
- 20 25) Counterfeit Audemars Piguet Men's watch 181247 No4005 Royal Oak Le
- 21 Brassus;
- 22 26) Lot of costume jewelry containing 1 pair of earrings, 2 bracelets, and 1 ring;
- 23 27) 18k gold yellow Gold-Plated Double C Cartier 468122 Lighter;
- 24 28) Four "Herkimer diamond" quartz crystals;
- 25 29) 14k yellow gold Tanzanite and diamond ring set;
- 26 30) 15k white gold diamond ring set with 16 straight baguette cut diamonds;
- 27 31) Platinum diamond ring set with six 1.7mm round brilliant cut diamonds;
- 28 32) 14k yellow gold diamond ring set with center oval cut diamond;
- 33) Costume jewelry necklace set with an oval cut Citrine;

- 1 34) 14k yellow gold amethyst necklace set with center oval cut amethyst;
- 2 35) 14k Garnet pendant hung on a 16-inch amethyst bead necklace;
- 3 36) 18k yellow gold Tiffany and Co. Elsa Peretti Starfish necklace;
- 4 37) 18k yellow gold Paloma Picasso scribble style pendant on a 16-inch chain;
- 5 38) 18k yellow gold Elsa Peretti Tiffany & Co. Seahorse necklace;
- 6 39) 14k two tone diamond necklace set with 72 round brilliant cut diamonds;
- 7 40) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Argent Pur Bullion
- 8 #991425906;
- 9 41) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Ardent Pur Bullion
- 10 #991425907;
- 11 42) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Argent Pur Bullion
- 12 #991425908;
- 13 43) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Argent Pur Bullion
- 14 #991425909;
- 15 44) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Argent Pur Bullion
- 16 #991422484;
- 17 45) Royal Canadian Mint Monnaie 10 oz 9999 Fine Silver Argent Pur Bullion
- 18 #991422487;
- 19 46) Royal Canadian Mint Monnaie 10 oz .9999 Fine Silver Argent Pur Bullion
- 20 #991422488;
- 21 47) Stainless Steel Gent's Cartier Santos 40mm Date Watch Serial Number
- 22 905815CX;
- 23 48) Stainless Steel Gent's Rolex Datejust Watch with Black Dial Serial Number
- 24 Z18001;
- 25 49) Stainless Steel Rolex Daytona Cosmograph Watch Serial Number CZ771495;
- 26 50) Rolex Sea-Dweller Oyster Stainless Steel Watch Serial Number 9H5802X5;
- 27 51) Twenty-five Canadian Maple Leaf 1-ounce .9999 pure gold coins;
- 28 52) Eight Australia \$100 Dollars 1-ounce gold coins;
- 53) Five United Kingdom 1-ounce 100-pound gold coins;

- 1 54) Three Elizabeth II gold coins;
- 2 55) Three Grant Wood American Commemorative Series Coins with American
- 3 Gothic;
- 4 56) Six United States \$50 Eagle gold coins;
- 5 57) Nine 1915 Austrian 100 Corona gold coins;
- 6 58) Two 1908 Hungary 100 Korona gold coins;
- 7 59) Four Mexico 50 pesos gold coins;
- 8 60) Twenty Metalor 1-ounce 999.9 fine gold bullion;
- 9 61) Twelve Valcambi Suisse 1-ounce gold bullion;
- 10 62) Four PAMP Suisse 1-ounce gold bullion;
- 11 63) Four IGR one 1 ounce 999.9 fine gold bullion;
- 12 64) Three Credit Suisse 1 ounce 999.9 fine gold bullion;
- 13 65) 2018 Australia Elizabeth II 999.9 1-ounce gold bullion;
- 14 66) Ten South African Krugerrand 1-ounce gold coins;
- 15 67) Eighty-eight Britannia 1/4-ounce 25-pound gold coins;
- 16 68) Two Canada 1 1/2-ounce \$150 gold bullion coins;
- 17 69) Three Werner Philharmoniker 2000 Schilling 999.9 pure 1-ounce coins;
- 18 70) Two Buffalo 1-ounce gold coins;
- 19 71) Two Royal Canadian Mint 10-ounce Fine Silver Argent Pur Bullion;
- 20 72) Ten 1-gram silver bullion assorted style bars;
- 21 73) Three-hundred and eighty U.S. American Eagle 1 ounce silver coins;
- 22 74) Stainless Steel Ladies Rolex Datejust Watch Serial Number 968E58Z5;
- 23 75) Fifteen Liberty Head \$20 gold coins;
- 24 76) 2009 American Eagle \$50 gold coin;
- 25 77) Forty-five Krugerrand gold coins;
- 26 78) Six Canadian Maple Leaf \$50 gold coins;
- 27 79) Six Canada 1/20th ounce Maple Leaf \$1 gold coins;
- 28 80) Canada 1/10th ounce Maple Leaf \$5 gold coin;
- 81) Two Canadian 1/4-ounce Maple Leaf \$10 gold coins;

- 1 82) Cartier 18k white Panthere style necklace;
- 2 83) 14k white gold diamond bracelet set with 68 round brilliant cut diamonds weighs
- 3 6.3 grams;
- 4 84) 14k white gold diamond bracelet set with 68 round brilliant cut diamonds weighs
- 5 6.7 grams;
- 6 85) 14k white gold diamond bracelet set with 15 round brilliant cut diamonds;
- 7 86) Gucci heart bracelet;
- 8 87) Sterling silver with Cubic Zirconia earrings;
- 9 88) Cartier 18k white gold Love ring XQS521 50;
- 10 89) 14k white gold diamond ring set with 7 round brilliant cut diamonds;
- 11 90) 14k white gold Tiffany style 6 prong Lab Grown diamond ring set;
- 12 91) Audemars Piguet Men's chronograph watch 26240ST Royal Oak Serial Number
- 13 GM3804N;
- 14 92) Audemars Piguet Men's chronograph watch 26120ST dual time Royal Oak Serial
- 15 Number H41161 No 3890;
- 16 93) Costume jewelry in a black jewelry box;
- 17 94) Three sterling silver earring pairs;
- 18 95) 18k yellow gold necklace;
- 19 96) Three Louis Vuitton Marc Newson Limited Edition Horizon Rolling Suitcases,
- 20 Model Horizon;
- 21 97) Three Louis Vuitton Marc Newson Rolling Trunk, Model M10117;
- 22 98) Louis Vuitton Taiga District PM Shoulder Bag;
- 23 99) Louis Vuitton Eclipse Sac Plat 24 Shoulder Bag;
- 24 100) Three Louis Vuitton Monogram Eclipse Dopp Kit Toiletry Pouch Bags;
- 25 101) Louis Vuitton Monogram Eclipse District PM Messenger Set Bag;
- 26 102) Louis Vuitton Monogram Eclipse Discovery Backpack PM;
- 27 103) Louis Vuitton Monogram Eclipse Trio Messenger Shoulder Bag;
- 28 104) Louis Vuitton Black Taiga Leather Avenue Sling Bag NM;
- 105) Louis Vuitton Monogram Week-End Tote GM;

- 1 106) Two Louis Vuitton Monogram Eclipse Passport Covers;
- 2 107) Louis Vuitton Empreinte Zoe Wallet;
- 3 108) Louis Vuitton Multiple Wallet;
- 4 109) Louis Vuitton Pocket Organizer Black/Noir;
- 5 110) Louis Vuitton Felicie Black Credit Card Insert;
- 6 111) Louis Vuitton The Neverfull GM Tote Removable Pouch;
- 7 112) Louis Vuitton Black Monogram Empreinte Leather Felicie Pochette;
- 8 113) Louis Vuitton Reverse Monogram Eclipse Pouch;
- 9 114) \$367,150 cash;
- 10 115) \$250,313.89 seized from Arizona Federal Credit Union account ending in
11 5125 in the name of ALEXANDRA MT GEHRKE;
- 12 116) \$1,000,000.00 seized from Arizona Federal Credit Union account ending in
13 5102 in the name of JEXIE ENTERPRISES INC.;
- 14 117) \$251,994.63 seized from U.S. Bank account ending in 5022 in the name of
15 Alexandra Marie Gehrke;
- 16 118) The contents of Charles Schwab account ending in 1438 in the name of
17 AMTG MEDICAL CONSULTANT LLC;
- 18 119) The contents of Charles Schwab account ending in 2726 in the name of
19 ALEXANDRA MARIE GEHRKE;
- 20 120) The contents of Charles Schwab account ending in 9986 in the name of
21 JEXIE ENTERPRISES INC.;
- 22 121) \$3,356,635.97 seized from the U.S. Bank checking account ending in 5772
23 in the name of THE CONSULTING FIRM LLC.
- 24 122) \$788,645.14 seized from U.S. Bank checking account ending in 5202 in the
25 name of KING MEDICAL CONSULTANT LLC.
- 26 123) \$528,387.94 seized from Wells Fargo checking account ending in 1495 in
27 the name of ALEXANDRA M. GEHRKE.
- 28 124) \$569,195.65 seized from Wells Fargo savings account ending in 8608 in
the name of ALEXANDRA M. GEHRKE.

- 1 125) \$555,900 seized from Wells Fargo checking account ending in 1487 in the
2 name of ALEXANDRA M. GEHRKE.
- 3 126) \$247,073.89 seized from Wells Fargo savings account ending in 3965 in
4 the names of ALEXANDRA M. GEHRKE and JOAN MARIE GEHRKE.
- 5 127) \$777,277.80 seized from Wells Fargo checking account ending in 0871 in
6 the name of AMTG MEDICAL CONSULTANT LLC.
- 7 128) The contents of Charles Schwab brokerage account ending in 2902 in the
8 name of J KING HOLDINGS INC.
- 9 129) The contents of Charles Schwab brokerage account ending in 8345 in the
10 name of THE OTHER CONSULTING FIRM LLC.
- 11 130) \$1,260,215.38 seized from Flagstar Bank trust account ending in 2863 in
12 the name of KENNETH MURRAY.
- 13 131) \$2,593,130.55 seized from Royal Bank of Canada cash account ending in
14 5128 in the name of SCOTTSDALE ASSURANCE GROUP INC.
- 15 132) Two – Linea Research ASC 48 Loudspeaker Processors – serial numbers
16 10324076, 10324063,
- 17 133) Four - Triad Orbit T2 Microphone Stands;
- 18 134) Seven – AVID MTRX 8CH AD Cards – serial numbers 7201302331240,
19 7201302331119, 7201302328251, 7202302336101, 7202302336154,
20 7201302331116, 7201302331115;
- 21 135) Two – AVID Pro Tools HDX Card Software – serial numbers
22 ENEOF32200043B, ENEOF24800029A;
- 23 136) Six – AVID MTRX 8CH DA Cards – serial numbers 7202302336155,
24 7202302336160, 7202302336136, 7202302336156, 7202302336153,
25 7202302336152;
- 26 137) One – RND Master Buss Processor – serial number P2MB4678;
- 27 138) One – RND Master Buss Transformer – serial number MBT00787;
- 28 139) One – RND 5035 Shelford Channel Microphone Amp – serial number
5035-06266;

- 1 140) Two – Tube Tech PE 1C – serial numbers 19186, 19187;
- 2 141) One – Tube Tech SMC 2BM Processor – serial number 16587;
- 3 142) Two – AVID MTRX-II Audio Interface – serial numbers MTRXII-
4 100691, MTRXII-100673;
- 5 143) One – Live Mix AD24 Headphone System – serial number 12-04-02068;
- 6 144) One – Live Mix Mix-16 Headphone System – serial number 12-02-07164;
- 7 145) Eight – Live Mix MT-1 Headphone System Stand Adapters;
- 8 146) Eight – Live Mix Headphone System 25’ Cat 6 Cables;
- 9 147) Eight – Live Mix CS Solo Headphone Mixers – serial numbers 12-11-
10 05001, 12-11-05002, 12-11-04999, 12-11-05004, 12-11-05003, 12-11-
11 05012, 12-11-05000, 12-11-04998;
- 12 148) One – Rupert Neve Designs 5088 32Ch Recording Console – serial
13 number 345;
- 14 149) Two – Neumann U67 Microphones;
- 15 150) Two – Neumann KM 184 Stereo Pair Black Microphones;
- 16 151) Two – Neumann U4 Fet Collector’s Edition Microphones;
- 17 152) Two – Neumann M49V Microphones;
- 18 153) One – Sennheiser MD 441-U Microphone;
- 19 154) Four – Sennheiser MD 421 Microphones;
- 20 155) Five – Triad Orbit Mini/TM Microphone Tripods;
- 21 156) Five – Triad Orbit Grav-Bags Ballast;
- 22 157) Three – Triad Orbit O2X Dual Boom Stands;
- 23 158) Three – Triad Orbit T1-OM-M2 Tripod Stand Systems;
- 24 159) One – Triad Orbit O1L Orbital Boom;
- 25 160) One – Triad Orbit Mini Single Arm Orbital Boom Microphone Stand;
- 26 161) Three – Triad Orbit Universal Smart Phone/Tablet Holders;
- 27 162) Three – Triad Orbit IO-H2/12 5/8" Mount Heads;
- 28 163) Two – Triad Orbit IO Desk Laptop Stands;
- 164) One – Grace SB-66 Space Bar Kit, Microphone Placement Bar.

1 Based upon the evidence set forth in the plea agreement, the United States has
2 established the requisite nexus between the Subject Property and the offense for which
3 the defendant has pled guilty. Accordingly, that property is subject to forfeiture to the
4 United States pursuant to 18 U.S.C. §§ 981, 982, 21 U.S.C. § 853 and 28 U.S.C. §
5 2461(c).

6 Rule 32.2(b) of the Federal Rules of Criminal Procedure provides that:

7 (1)(A) As soon as practicable after a verdict or finding of guilty, or after a
8 plea of guilty or *nolo contendere* is accepted, on any count in an indictment
9 or information regarding which criminal forfeiture is sought, the court must
10 determine what property is subject to forfeiture under the applicable statute.
11 If the government seeks forfeiture of specific property, the court must
12 determine whether the government has established the requisite nexus
13 between the property and the offense. If the government seeks a personal
14 money judgment, the court must determine the amount of money that the
15 defendant will be ordered to pay. The court's determination may be based
16 on evidence already in the record, including any written plea agreement or,
17 if the forfeiture is contested, on evidence or information presented by the
18 parties at a hearing after the verdict or finding of guilt.

19 (2)(A) If the court finds that property is subject to forfeiture, it must
20 promptly enter a preliminary order of forfeiture setting forth the amount of
21 any money judgment or directing the forfeiture of specific property without
22 regard to any third party's interest in all or part of it. Determining whether a
23 third party has such an interest must be deferred until any third party files a
24 claim in an ancillary proceeding under Rule 32.2(c).

25 (3) The entry of a preliminary order of forfeiture authorizes the Attorney
26 General (or a designee) to seize the specific property subject to forfeiture;
27 to conduct any discovery the court considers proper in identifying, locating,
28 or disposing of the property; and to commence proceedings that comply
with any statutes governing third-party rights. At sentencing - or at any
time before sentencing if the defendant consents - the order of forfeiture
becomes final as to the defendant and must be made part of the sentence
and be included in the judgment. The court may include in the order of
forfeiture conditions reasonably necessary to preserve the property's value
pending any appeal.

26 Upon the issuance of a preliminary order of forfeiture, the United States will
27 publish notice regarding the Subject Property on the government's official internet
28 website www.forfeiture.gov, and will send direct notice to any person, other than the

1 defendant(s), having or claiming a legal interest in the property, advising such person of
2 his or her right to file a petition contesting the forfeiture in according with 21 U.S.C. §
3 853(n) and Rule 32.2(c). This notice will state that the petition shall be for a hearing to
4 adjudicate the validity of the petitioner's alleged interest in the property, shall be signed
5 by the petitioner under penalty of perjury and shall set forth the nature and extent of the
6 petitioner's right, title or interest in the forfeited property and any additional facts
7 supporting the petitioner's claim and the relief sought, and serve a copy upon **Joseph F.**
8 **Bozdech**, Assistant United States Attorney. The United States may also, to the extent
9 practicable, provide direct written notice to any persons known to have alleged an interest
10 in the Subject Property.

11 In accordance with 28 U.S.C. § 2461 and Fed. R. Crim. P. 32.2(b)(3), the United
12 States requests that it be permitted to undertake whatever discovery is necessary to
13 identify, locate or dispose of property subject to forfeiture, or substitute assets for such
14 property.

15 WHEREFORE, the United States respectfully requests that this Court enter a
16 preliminary order of forfeiture forfeiting to the United States the Subject Property.

17 DATED this 12th day of August 2025.

18 TIMOTHY COURCHINE
19 United States Attorney
District of Arizona

20 S/Joseph F. Bozdech
21 JOSEPH F. BOZDECH
22 Assistant United States Attorney
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CERTIFICATION

I certify that on August 12, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant: counsel of record.

Joshua Lowther
jlowther@lowtherwalker.com

S/Victoria Tiffany
U.S. Attorney's Office